

CONTAINS NO CBI



Form Approved  
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EPA-OTS



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90-890000-338

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Comprehensive Assessment Information Rule  
REPORTING FORM

89 JUL 06 AM 9:55  
U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE

When completed, send this form to:

Document Processing Center  
Office of Toxic Substances, TS-790  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460  
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: \_\_\_\_\_  
Document  
Control Number: \_\_\_\_\_  
Docket Number: \_\_\_\_\_

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [7][2] [2][2] [8][8]  
CBI mo. day year

- ☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. .... 0126477-162-5
- b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.
- (i) Chemical name as listed in the rule ..... NA
- (ii) Name of mixture as listed in the rule ....
- (iii) Trade name as listed in the rule .....
- c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.
- Name of category as listed in the rule ..... NA
- CAS No. of chemical substance ..... [ ][ ][ ][ ][ ][ ]-[ ][ ]-[ ]
- Name of chemical substance .....

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

- CBI Manufacturer ..... 1
- ☐ Importer ..... 2
- Processor ..... ③
- X/P manufacturer reporting for customer who is a processor ..... 4
- X/P processor reporting for customer who is a processor ..... 5

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI  
☒ Yes ..... ☒ Go to question 1.04  
☐ No ..... ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI  
☐ Yes ..... 1  
☐ No ..... (2)

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s) ....

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI  
☐ Trade name ..... MONDUR TD-80 ; TDI-80-20  
☐ Is the trade name product a mixture? Circle the appropriate response.  
Yes ..... 1  
No ..... 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI  
☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

K. L. SCHAPER  
NAME

[Signature]  
SIGNATURE

30 JUN 89  
DATE SIGNED

MANAGER, PRODUCT SAFETY (412) 963 - 5805  
TITLE TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

CBI

☐

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

NAME \_\_\_\_\_ SIGNATURE NA \_\_\_\_\_ DATE SIGNED \_\_\_\_\_  
TITLE \_\_\_\_\_ ( ) \_\_\_\_\_ TELEPHONE NO. \_\_\_\_\_ DATE OF PREVIOUS SUBMISSION \_\_\_\_\_

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI

☐

"My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

NAME \_\_\_\_\_ SIGNATURE NA \_\_\_\_\_ DATE SIGNED \_\_\_\_\_  
TITLE \_\_\_\_\_ ( ) \_\_\_\_\_ TELEPHONE NO. \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

### 1.09 Facility Identification

[illegible]

SPRINGDALE City

[P][A]      [1][5][7][4][4]--[1][5][0][6]  
State                  Zip

Dun & Bradstreet Number .....[0][0]-[4][3][3]-[6][3][1][9]

EPA ID Number ..... P A D . [0][0][4][3][3][6][3][1][9]

Employer ID Number ..... *NA* ..... [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

Primary Standard Industrial Classification (SIC) Code .....[2][8][5][1]

Other SIC Code .....[2][8][2][7]

Other SIC Code .....[ ][ ][ ][ ]

[ ] Address [O]N[E] [P]P[G] [P]L[A]C[E] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]  
Street

[P][I][T][T][S][B][U][R][G][H][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]  
City

State Zip

Dun & Bradstreet Number .....[0][6]-[1][3][4]-[4][8][0][3]

Employer ID Number ..... 2 5 0 7 3 0 7 8 0

6

## NA

[illegible]

Street

City

City

State Zip

State

Zip

Dun &amp; Bradstreet Number .....( ) ( ) -( ) ( ) ( ) -( ) ( ) ( ) ( )

CBI Name [S][T][A][N][L][E][Y] [C][O][S][L][O][S][K][Y] \_ \_ \_ \_ \_

[ ] Title SENTINOR-PRODUCT-SAFETY-ANALYSIS

Address [2][6][0] [K][A][P][P][A] [D][R][I][V][E] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]  
Street

Street

[P][I][T][T][S][B][U][R][G][H][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]  
City

City

[P] [A]  
State

[1] [5] [2] [3] [8] -- [ ] [ ] [ ] [ ]  
Zip

State

Zip

Telephone Number .....[4][7][2]-[9][6][3]-[5][8][7][7]

1.13 This reporting year is from .....  $\begin{bmatrix} \overline{5} & \overline{1} \end{bmatrix}$   $\begin{bmatrix} \overline{8} & \overline{8} \end{bmatrix}$  to  $\begin{bmatrix} \overline{1} & \overline{2} \end{bmatrix}$   $\begin{bmatrix} \overline{8} & \overline{8} \end{bmatrix}$   
Mo. Year Mo. Year

Mo.

Year

No.

Year

☐ Mark (X) this box if you attach a continuation sheet.

NA

[illegible]

[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

City

[ ] [ ]      [ ] [ ] [ ] [ ] [ ] -- [ ] [ ] [ ] [ ]

State

Zip

Employer ID Number .....[ ][ ][ ][ ][ ][ ][ ][ ]

Date of Sale ..... ( ) ( ) ( )

Mo.

Day

Year

Contact Person [ ]

Telephone Number .....( )-( )-( )

NA

[illegible]

Street

[ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]

City

[ ] [ ]    [ ] [ ] [ ] [ ] [ ] -- [ ] [ ] [ ] [ ]

State

**Zip**

Employer ID Number .....([ ][ ] [ ][ ] [ ][ ] [ ][ ] [ ][ ] [ ][ ])

Date of Purchase .....[ ] [ ] [ ] [ ]

Mo.

Day

Year

[illegible]

Telephone Number .....( )-()-()

☐ Mark (X) this box if you attach a continuation sheet.

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

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Classification

Quantity (kg/yr)

Manufactured ..... NA  
Imported ..... NA  
Processed (include quantity repackaged) ..... 41405

Of that quantity manufactured or imported, report that quantity:

In storage at the beginning of the reporting year ..... NA  
For on-site use or processing ..... NA  
For direct commercial distribution (including export) ..... NA  
In storage at the end of the reporting year ..... NA

Of that quantity processed, report that quantity:

In storage at the beginning of the reporting year ..... 6981  
Processed as a reactant (chemical producer) ..... 41405  
Processed as a formulation component (mixture producer) ..... NA  
Processed as an article component (article producer) ..... NA  
Repackaged (including export) ..... NA  
In storage at the end of the reporting year ..... 6058

☐ Mark (X) this box if you attach a continuation sheet.



PART C IDENTIFICATION OF MIXTURES

- 1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

CBI

☐

Component Name	Supplier Name	Average % Composition by Weight (specify precision, e.g., 45% ± 0.5%)
NA	NA	NA
Total		100%

☐ Mark (X) this box if you attach a continuation sheet.

2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending ..... [1][2] [8][7]  
Mo. Year

Quantity manufactured ..... NA kg

Quantity imported ..... NA kg

Quantity processed ..... 32638 kg

Year ending ..... [1][2] [8][6]  
Mo. Year

Quantity manufactured ..... NA kg

Quantity imported ..... NA kg

Quantity processed ..... 25733 kg

Year ending ..... [1][2] [8][5]  
Mo. Year

Quantity manufactured ..... NA kg

Quantity imported ..... NA kg

Quantity processed ..... 30324 kg

2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ NA

Continuous process ..... 1

Semicontinuous process ..... 2

Batch process ..... 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

☐

Continuous process .....

Semicontinuous process .....

Batch process ..... (3)

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

CBI

☐

Manufacturing capacity ..... NA kg/yr

Processing capacity ..... NA kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

CBI

☐

	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase			0
Amount of decrease			0

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

	<u>Days/Year</u>	<u>Average Hours/Day</u>
--	------------------	------------------------------

Process Type #1 (The process type involving the largest quantity of the listed substance.)

Manufactured .....	<u>NA</u>	<u>NA</u>
Processed .....	<u>64</u>	<u>14</u>

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

Manufactured .....	_____	_____
Processed .....	_____	_____

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

Manufactured .....	_____	_____
Processed .....	_____	_____

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

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Maximum daily inventory .....	_____	kg
Average monthly inventory .....	_____	kg

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI  
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CAS No.	Chemical Name	Byproduct, Coproduct or Impurity <sup>1</sup>	Concentration (%) (specify ± % precision)	Source of Byproducts, Coproducts, or Impurities
NA	WA	NA	NA	NA

<sup>1</sup>Use the following codes to designate byproduct, coproduct, or impurity:

- B = Byproduct
- C = Coproduct
- I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

- 2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

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a. Product Types <sup>1</sup>	b. % of Quantity Manufactured, Imported, or Processed	c. % of Quantity Used Captively On-Site	d. Type of End-Users
X	100	100	I

<sup>1</sup>Use the following codes to designate product types:

- |  |   |
|--|---|
| A = Solvent  | L = Moldable/Castable/Rubber and additives              |
| B = Synthetic reactant                             | M = Plasticizer   |
| C = Catalyst/Initiator/Accelerator/<br>Sensitizer  | N = Dye/Pigment/Colorant/Ink and additives              |
| D = Inhibitor/Stabilizer/Scavenger/<br>Antioxidant | O = Photographic/Reprographic chemical<br>and additives |
| E = Analytical reagent                             | P = Electrodeposition/Plating chemicals                 |
| F = Chelator/Coagulant/Sequestrant                 | Q = Fuel and fuel additives                             |
| G = Cleanser/Detergent/Degreaser                   | R = Explosive chemicals and additives                   |
| H = Lubricant/Friction modifier/Antiwear<br>agent  | S = Fragrance/Flavor chemicals                          |
| I = Surfactant/Emulsifier                          | T = Pollution control chemicals                         |
| J = Flame retardant                                | U = Functional fluids and additives                     |
| K = Coating/Binder/Adhesive and additives          | V = Metal alloy and additives                           |
|  | W = Rheological modifier                                |
|  | X = Other (specify) <u>Raw Material</u>                 |

<sup>2</sup>Use the following codes to designate the type of end-users:

- |                 |                           |
|-----------------|---------------------------|
| I = Industrial  | CS = Consumer             |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

☐

a.	b.	c.	d.
Product Types <sup>1</sup>	% of Quantity Manufactured, Imported, or Processed	% of Quantity Used Captively On-Site	Type of End-Users <sup>2</sup>
X	100	100	I

<sup>1</sup>Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) <u>Raw Material</u>

<sup>2</sup>Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product  
 CBI manufactured, imported, or processed at your facility that contains the listed  
☐ substance other than as an impurity.

a.	b.	c.	d.
Product Type <sup>1</sup>	Final Product's Physical Form <sup>2</sup>	Average % Composition of Listed Substance in Final Product	Type of End-Users <sup>3</sup>
NA	NA	NA	NA

<sup>1</sup>Use the following codes to designate product types:

A = Solvent	L = Moldable/Castable/Rubber and additives
B = Synthetic reactant	M = Plasticizer
C = Catalyst/Initiator/Accelerator/ Sensitizer	N = Dye/Pigment/Colorant/Ink and additives
D = Inhibitor/Stabilizer/Scavenger/ Antioxidant	O = Photographic/Reprographic chemical and additives
E = Analytical reagent	P = Electrodeposition/Plating chemicals
F = Chelator/Coagulant/Sequestrant	Q = Fuel and fuel additives
G = Cleanser/Detergent/Degreaser	R = Explosive chemicals and additives
H = Lubricant/Friction modifier/Antiwear agent	S = Fragrance/Flavor chemicals
I = Surfactant/Emulsifier	T = Pollution control chemicals
J = Flame retardant	U = Functional fluids and additives
K = Coating/Binder/Adhesive and additives	V = Metal alloy and additives
	W = Rheological modifier
	X = Other (specify) _____

<sup>2</sup>Use the following codes to designate the final product's physical form:

A = Gas	F2 = Crystalline solid
B = Liquid	F3 = Granules
C = Aqueous solution	F4 = Other solid
D = Paste	G = Gel
E = Slurry	H = Other (specify) _____
F1 = Powder	

<sup>3</sup>Use the following codes to designate the type of end-users:

I = Industrial	CS = Consumer
CM = Commercial	H = Other (specify) _____

☐ Mark (X) this box if you attach a continuation sheet.



2.15 CBI Circle all applicable modes of transportation used to deliver bulk shipments of the listed substance to off-site customers.

- ☐ Truck .....  
Railcar .....  
Barge, Vessel .....  
Pipeline .....  
Plane .....  
Other (specify) NA .....

2.16 CBI Customer Use -- Estimate the quantity of the listed substance used by your customers or prepared by your customers during the reporting year for use under each category of end use listed (i-iv).

☐

Category of End Use

i. Industrial Products

Chemical or mixture ..... NA kg/yr  
Article ..... NA kg/yr

ii. Commercial Products

Chemical or mixture ..... NA kg/yr  
Article ..... NA kg/yr

iii. Consumer Products

Chemical or mixture ..... NA kg/yr  
Article ..... NA kg/yr

iv. Other

Distribution (excluding export) ..... NA kg/yr  
Export ..... NA kg/yr  
Quantity of substance consumed as reactant ..... NA kg/yr  
Unknown customer uses ..... NA kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

# SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

## PART A GENERAL DATA

3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases. The average price is the market value of the product that was traded for the listed substance.

CBI

☐

Source of Supply	Quantity (kg)	Average Price (\$/kg)
The listed substance was manufactured on-site.	NA	
The listed substance was transferred from a different company site.	NA	
The listed substance was purchased directly from a manufacturer or importer.	40454	0.24
The listed substance was purchased from a distributor or repackager.	NA	
The listed substance was purchased from a mixture producer.	NA	

3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

CBI

☐

- Truck ..... ①
- Railcar ..... 2
- Barge, Vessel ..... 3
- Pipeline ..... 4
- Plane ..... 5
- Other (specify) ..... 6

☐ Mark (X) this box if you attach a continuation sheet.

3.03  
CBI

☐

a. Circle all applicable containers used to transport the listed substance to your facility.

- Bags ..... 1  
Boxes ..... 2  
Free standing tank cylinders ..... 3  
Tank rail cars ..... 4  
Hopper cars ..... 5  
Tank trucks ..... 6  
Hopper trucks ..... 7  
Drums ..... 8  
Pipeline ..... 9  
Other (specify) ..... 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders ..... NA mmHg  
Tank rail cars ..... NA mmHg  
Tank trucks ..... NA mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

<u>Trade Name</u>	<u>Supplier or Manufacturer</u>	<u>Average % Composition by Weight (specify <math>\pm</math> % precision)</u>	<u>Amount Processed (kg/yr)</u>
NA	NA	NA	NA

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the  
 CBI reporting year in the form of a class I chemical, class II chemical, or polymer, and  
☐ the percent composition, by weight, of the listed substance.

	Quantity Used (kg/yr)	% Composition by Weight of Listed Sub- stance in Raw Material (specify $\pm$ % precision)
Class I chemical	41405	100%
Class II chemical	NA	
Polymer	NA	

☐ Mark (X) this box if you attach a continuation sheet.

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## SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

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### General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

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### PART A PHYSICAL/CHEMICAL DATA SUMMARY

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- 4.01 Specify the percent purity for the three major<sup>1</sup> technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

CBI

☐

	<u>Manufacture</u>	<u>Import</u>	<u>Process</u>
Technical grade #1	<u>NA</u> % purity	<u>NA</u> % purity	<u>100</u> % purity
Technical grade #2	_____ % purity	_____ % purity	_____ % purity
Technical grade #3	_____ % purity	_____ % purity	_____ % purity

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<sup>1</sup>Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ..... (1)

No ..... 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company ..... 1

Another source ..... (2)

---

☐ Mark (X) this box if you attach a continuation sheet.

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# MATERIAL SAFETY DATA SHEET



## DIVISION ADDRESS

Mobay Corporation  
Polyurethane Division  
Mobay Road  
Pittsburgh, Pennsylvania 15205

ISSUE DATE  
SUPERSEDES

10/22/86  
11/26/85

TRANSPORTATION EMERGENCY: CALL CHEMTREC  
TELEPHONE NO: 800-424-9300; DISTRICT OF COLUMBIA: 202-483-7616

MOBAY NON-TRANSPORTATION EMERGENCY NO.:  
412-923-1800

## I. PRODUCT IDENTIFICATION

PRODUCT NAME.....: Mondur TD-80 (All Grades)  
PRODUCT CODE NUMBER.....: E-002  
CHEMICAL FAMILY.....: Aromatic Isocyanate  
CHEMICAL NAME.....: Toluene Diisocyanate (TDI)  
SYNONYMS.....: Benzene, 1,3-diisocyanato methyl-  
CAS NUMBER.....: 26471-62-5  
T.S.C.A. STATUS.....: On Inventory  
CHEMICAL FORMULA.....:  $C_9H_6N_2O_2$   
OSHA HAZARD COMMUNICATION

STATUS.....: This product is hazardous under the criteria of the Federal OSHA Hazard Communication Standard 29 CFR 1910.1200.

## II. HAZARDOUS INGREDIENTS

COMPONENTS:	%:	OSHA-PEL	ACGIH-TLV
2,4-Toluene Diisocyanate (TDI) CAS# 584-84-9	80%	0.02 ppm- Ceiling	0.005 ppm TWA- 0.02 ppm STE
2,6-Toluene Diisocyanate (TDI) CAS# 91-08-7	20%	Not Established	Not Established

## III. PHYSICAL DATA

APPEARANCE.....: Liquid  
COLOR.....: Water white to pale yellow  
ODOR.....: Sharp, pungent  
ODOR THRESHOLD.....: Greater than TLV of 0.005 ppm  
MOLECULAR WEIGHT.....: 174  
MELT POINT/FREEZE POINT...: Approx. 55°F (13°C)  
BOILING POINT.....: Approx. 484°F (251°C)  
VAPOR PRESSURE.....: Approx. 0.025 mmHg @ 25°C (77°F)  
VAPOR DENSITY (AIR=1).....: 6.0  
pH.....: Not Applicable  
SPECIFIC GRAVITY.....: 1.22 @ 25°C  
BULK DENSITY.....: 10.18 lbs/gal  
SOLUBILITY IN WATER.....: Reacts slowly with water at normal room temperature to liberate CO<sub>2</sub> gas  
% VOLATILE BY VOLUME.....: Negligible

#### IV. FIRE & EXPLOSION DATA

FLASH POINT °F(°C).....: 260°F (127°C) Pensky-Martens Closed Cup

FLAMMABLE LIMITS -

Lel.....: 0.9%

Uel.....: 9.5%

EXTINGUISHING MEDIA.....: Dry chemical (e.g. monoammonium phosphate, potassium sulfate, and potassium chloride), carbon dioxide, high expansion (proteinic) chemical foam, water spray for large fires. Caution: Reaction between water or foam and hot TDI can be vigorous.

SPECIAL FIRE FIGHTING PROCEDURES/UNUSUAL FIRE OR EXPLOSION HAZARDS:

Full emergency equipment with self-contained breathing apparatus and full protective clothing (such as rubber gloves, boots, bands around legs, arms and waist) should be worn by fire fighters. No skin surface should be exposed. During a fire, TDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. (See Section VIII). At temperatures greater than 350°F (177°C) TDI forms carbodiimides with the release of CO<sub>2</sub> which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

#### V. HUMAN HEALTH DATA

PRIMARY ROUTE(S) OF

ENTRY.....: Inhalation. Skin Contact from liquid, vapors or aerosols.

EFFECTS AND SYMPTOMS OF OVEREXPOSURE

INHALATION:

Acute Exposure. TDI vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperreactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis, bronchial spasm and pulmonary edema (fluid in lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g., fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

Chronic Exposure. As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. These symptoms, which can include chest tightness, wheezing, cough, shortness of breath or asthmatic attack, could be immediate or delayed up to several hours after exposure. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

Product Code: E-002

Page 2 of 7



## V. HUMAN HEALTH DATA (Continued)

### SKIN CONTACT

Acute Exposure. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

Chronic. Prolonged contact can cause reddening, swelling, rash, scaling, blistering, and, in some cases, skin sensitization. Individuals who have developed a skin sensitization can develop these symptoms as a result of contact with very small amounts of liquid material or as a result of exposure to vapor.

### EYE CONTACT

Acute Exposure. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. However, damage is usually reversible. See Section VI for treatment.

Chronic Exposure. Prolonged vapor contact may cause conjunctivitis.

### INGESTION

Acute Exposure. Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Chronic Exposure. None found.

### MEDICAL CONDITIONS

AGGRAVATED BY EXPOSURE.: Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperactivity), skin allergies, eczema.

CARCINOGENICITY.....: No carcinogenic activity was observed in lifetime inhalation studies in rats and mice (International Isocyanate Institute).

NTP.....: The National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered in corn-oil and introduced into the stomach through a tube. Based on this study, the NTP has listed TDI as a substance that may reasonably be anticipated to be a carcinogen in its Fourth Annual Report on Carcinogens.

IARC.....: IARC has announced that it will list TDI as a substance for which there is sufficient evidence for its carcinogenicity in experimental animals but inadequate evidence for the carcinogenicity of TDI to humans (IARC Monograph 39).

OSHA.....: Not listed.

### EXPOSURE LIMITS

OSHA PEL.....: 0.02 ppm Ceiling.

ACGIH TLV.....: 0.005 ppm TWA/0.02 ppm STEL

## VI. EMERGENCY & FIRST AID PROCEDURES

EYE CONTACT.....: Flush with clean, lukewarm water (low pressure) for at least 15 minutes holding eyelids open all the time, and obtain medical attention. Refer individual to an ophthalmologist for immediate follow-up.

SKIN CONTACT.....: Remove contaminated clothing immediately. Wash affected areas thoroughly with soap or tincture of green soap and water for at least 15 minutes. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower after removing clothing, get medical attention, and consult physician.

INHALATION.....: Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention.. Asthmatic-type symptoms may develop and may be immediate or delayed up to several hours. Consult physician.

INGESTION.....: Do not induce vomiting. Give 250 ml of milk or water to drink. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Consult physician.

NOTE TO PHYSICIAN.....: Eyes. Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. Skin. Treat as contact dermatitis. If burned, treat as thermal burn. Respiratory. Treatment is essentially symptomatic.

## VII. EMPLOYEE PROTECTION RECOMMENDATIONS

EYE PROTECTION.....: Liquid chemical goggles or full-face shield. Contact lenses should not be worn. If vapor exposure is causing irritation, use a full-face, air-supplied respirator.

SKIN PROTECTION.....: Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water. Cover as much of the exposed skin area as possible with appropriate clothing. If skin creams are used, keep the area covered by the cream to a minimum.

RESPIRATORY PROTECTION....: An approved positive pressure air-supplied respirator is required whenever TDI concentrations are not known or exceed the Short-Term Exposure or Ceiling Limit of 0.02 ppm or exceed the 8-hour Time Weighted Average TLV of 0.005 ppm. An approved air-supplied respirator with full facepiece must also be worn during spray application, even if exhaust ventilation is used. For emergency and other conditions where the exposure limits may be greatly exceeded, use an approved, positive pressure self-contained breathing apparatus. TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than 0.02 ppm. Observe OSHA regulations for respirator use (29 CFR 1910.134).

VENTILATION.....: Local exhaust should be used to maintain levels below the TLV whenever TDI is handled, processed, or spray-applied. At normal room temperatures (70°F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH Industrial Ventilation) should be consulted for guidance about adequate ventilation.

## VII. EMPLOYEE PROTECTION RECOMMENDATIONS (Continued)

**MEDICAL SURVEILLANCE.....:** Medical supervision of all employees who handle or come in contact with TDI is recommended. These should include preemployment and periodic medical examinations with respiratory function tests (FEV, FVC as a minimum). Persons with asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or sensitization should be excluded from working with TDI. Once a person is diagnosed as sensitized to TDI, no further exposure can be permitted.

**MONITORING.....:** TDI exposure levels must be monitored by accepted monitoring techniques to ensure that the TLV is not exceeded. (Contact Mobay for guidance). See Volume 1 (Chapter 17) and Volume 3 (Chapter 3) in Patty's Industrial Hygiene and Toxicology for sampling strategy.

**OTHER.....:** Safety showers and-eyewash stations should be available. Educate and train employees in safe use of product. Follow all label instructions.

## VIII. REACTIVITY DATA

**STABILITY.....:** Stable under normal conditions.

**POLYMERIZATION.....:** May occur if in contact with moisture or other materials which react with isocyanates. Self-reaction may occur at temperatures over 350°F (177°C) or at lower temperatures if sufficient time is involved. See Section IV.

### **INCOMPATIBILITY**

**(MATERIALS TO AVOID)....:** Water, amines, strong bases, alcohols. Will cause some corrosion to copper alloys and aluminum. Reacts with water to form heat, CO<sub>2</sub>, and insoluble ureas.

### **HAZARDOUS DECOMPOSITION**

**PRODUCTS.....:** By high heat and fire: carbon monoxide, oxides of nitrogen, traces of HCN, TDI vapors and mist..

## IX. SPILL OR LEAK PROCEDURES

### **STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:**

Evacuate and ventilate spill area; dike spill to prevent entry into water system; wear full protective equipment, including respiratory equipment during clean-up. (See Section VII).

**Major Spill:** Call Mobay at 412/923-1800. If transportation spill, call CHEMTREC 800/424-9300. If temporary control of isocyanate vapor is required, a blanket of protein foam (available at most fire departments) may be placed over the spill. Large quantities may be pumped into closed, but not sealed, container for disposal.

**Minor Spill:** Absorb isocyanate with sawdust, or other absorbent, shovel into suitable unsealed containers, transport to well-ventilated area (outside) and treat with neutralizing solution: mixture of water (80%) with non-ionic surfactant Tergitol TMN-10 (20%), or; water (90%), concentrated ammonia (3-8%) and detergent (2%). Add about 10 parts of neutralizer per part of isocyanate, with mixing. Allow to stand uncovered for 48 hours to let CO<sub>2</sub> escape.

**Clean-up:** Decontaminate floor with decontamination solution letting stand for at least 15 minutes.

## IX. SPILL OR LEAK PROCEDURES (Continued)

CERCLA (SUPERFUND) REPORTABLE QUANTITY: 100 pounds  
WASTE DISPOSAL METHOD: Follow all federal, state or local regulations. TDI must be disposed of in a permitted incinerator or landfill. Incineration is the preferred method for liquids. Solids are usually incinerated or landfilled. Empty containers must be handled with care due to product residue. Decontaminate containers prior to disposal. Empty decontaminated containers should be crushed to prevent reuse. DO NOT HEAT OR CUT EMPTY CONTAINER WITH ELECTRIC OR GAS TORCH. (See Sections IV and VIII). Vapors and gases may be highly toxic.

RCRA STATUS.....: TDI is listed as a hazardous waste (No. U-233) under Title 40 Code of Federal Regulations, Section 261.33 (f). The residue from decontaminating a TDI spill is also classified as a hazardous waste under Section 261.3 (c)(2) of RCRA.

## X. SPECIAL PRECAUTIONS & STORAGE DATA

### STORAGE TEMPERATURE

(MIN./MAX.).....: 70°F (21°C)/90°F (32°C)

AVERAGE SHELF LIFE.....: 12 months

### SPECIAL SENSITIVITY

(HEAT, LIGHT, MOISTURE): If container is exposed to high heat, 375°F (177°C) it can be pressurized and possibly rupture. TDI reacts slowly with water to form polyureas and liberates CO<sub>2</sub> gas. This gas can cause sealed containers to expand and possibly rupture.

### PRECAUTIONS TO BE TAKEN

IN HANDLING AND STORING: Store in tightly closed containers to prevent moisture contamination. Do not reseal if contamination is suspected. Prevent all contact. Do not breathe the vapors. Warning properties (irritation of the eyes, nose and throat or odor) are not adequate to prevent chronic overexposure from inhalation. This material can produce asthmatic sensitization upon either single inhalation exposure to a relatively high concentration or upon repeated inhalation exposures to lower concentrations. Exposure to vapors of heated TDI can be extremely dangerous. Employee education and training in safe handling of this product are required under the OSHA Hazard Communication Standard.

## XI. SHIPPING DATA

D.O.T. SHIPPING NAME.....: Toluene Diisocyanate  
TECHNICAL SHIPPING NAME...: Toluene Diisocyanate  
D.O.T. HAZARD CLASS.....: Poison B  
UN/NA NO.....: UN 2078  
PRODUCT RQ.....: 100 Pounds  
D.O.T. LABELS .....: Poison  
D.O.T. PLACARDS.....: Poison  
FRT. CLASS BULK.....: Toluene Diisocyanate  
FRT. CLASS PKG.....: Chemicals NOI (Toluene Diisocyanate) NMFC 60000  
PRODUCT LABEL.....: Mondur TD-80 Product Label

## XII. ANIMAL TOXICITY INFORMATION

ACUTE.....:  
ORAL, LD50.....: 5800 mg/kg (Rats)  
DERMAL, LD50.....: Greater than 10 g/kg (Rabbits)  
INHALATION, LC50.....: Range 12.7 to 66 ppm for 1-4 hour (Rat)  
EYE EFFECTS.....: Strongly irritating (Rabbits) OECD Guidelines  
SKIN EFFECTS.....: Corrosive to the skin (Rabbits) OECD Guidelines.  
SENSITIZATION.....: Skin sensitizer in guinea pigs. One study  
(available upon request) with guinea pigs reported that repeated skin contact  
with TDI caused respiratory sensitization.  
SUB-ACUTE/SUB-CHRONIC...: Animal tests indicated that TDI inhalation caused  
irritation of the mucous membranes of the respiratory tract.  
CHRONIC.....: Rats and mice exposed to 0.05 to 0.15 ppm for two  
years resulted in irritation of the mucous membranes of the respiratory tract.  
(International Isocyanate Institute). In lifetime inhalation studies  
conducted by Hazelton Labs for the International Isocyanate Institute, TDI did  
not demonstrate carcinogenic (cancer causing) activity in rats or mice.

MUTAGENIC TESTS: Results of mutagenic (genotoxic) studies are conflicting  
with some tests positive and others negative.  
REPRODUCTIVE TESTS.....: The International Isocyanate Institute is presently  
conducting reproductive toxicity testing on TDI.  
AQUATIC TOXICITY.....: LC<sub>50</sub> (24 hour) for TD-80 is greater than 500 mg/l  
(Daphnea, Limnea Invertebrates and Zebra Fish).

## XIII. APPROVALS

REASON FOR ISSUE.....: Revision onto New Format  
APPROVED BY.....: J.H. Chapman  
TITLE.....: Manager, Product Safety - Polyurethane Division  
DATE APPROVED.....: 9/9/86

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes ..... NA ..... 1  
 No ..... 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI

☐

Activity	Physical State				
	Solid	Slurry	Liquid	Liquified Gas	Gas
Manufacture	1	2	3	4	5
Import	1	2	3	4	5
Process	1	2	③	4	5
Store	1	2	③	4	5
Dispose	1	2	③	4	5
Transport	1	2	③	4	5

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09. Photocopy this question and complete it separately for each emission point source.

CBI

☐

Point source ID code ..... NA

Size Range (microns)

Mass Fraction (% ± % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

# PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Percentage of time per year that the listed substance is exposed to this process type ..... 19 %

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					
	Less than 5%	5-10%	11-25%	26-75%	76-99%	Greater than 99%
Pump seals <sup>1</sup>						
Packed	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Mechanical	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Double mechanical <sup>2</sup>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Compressor seals <sup>1</sup>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Flanges	<u>3</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Valves						
Gas <sup>3</sup>	<u>2</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Liquid	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Pressure relief devices <sup>4</sup> (Gas or vapor only)	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>5</u>
Sample connections						
Gas	<u>1</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Liquid	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Open-ended lines <sup>5</sup> (e.g., purge, vent)						
Gas	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>
Liquid	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>

<sup>1</sup>List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.



## 10.13 (continued)

<sup>2</sup>If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

<sup>3</sup> Conditions existing in the valve during normal operation

<sup>4</sup>Report all pressure relief devices in service, including those equipped with control devices

<sup>5</sup>Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

1

[illegible]

<sup>1</sup>Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

<sup>2</sup>The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

- 10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type .....

NA

Equipment Type	Leak Detection	Detection Device <sup>1</sup>	Frequency of Leak Detection (per year)	Repairs Initiated (days after detection)	Repairs Completed (days after initiated)
	Concentration (ppm or mg/m <sup>3</sup> ) Measured at _____ Inches from Source				
Pump seals					
Packed					
Mechanical					
Double mechanical					
Compressor seals					
Flanges					
Valves					
Gas					
Liquid					
Pressure relief devices (gas or vapor only)					
Sample connections					
Gas					
Liquid					
Open-ended lines					
Gas					
Liquid					

<sup>1</sup>Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

10.16 **Raw Material, Intermediate and Product Storage Emissions** - - Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block Flow diagram(s).

[illegible]

<sup>1</sup>Use the following codes to designate vessel type:

<sup>2</sup>Use the following codes to designate floating roof seals:

- F = Fixed roof  
 CTF = Contact internal Floating roof  
 NCTF = Noncontact internal Floating roof  
 EFR = External Floating roof  
 P = Pressure vessel (indicate pressure rating)  
 H = Horizontal  
 U = Underground

- MS1 = Mechanical shoe, primary  
MS2 = Shoe-mounted secondary  
MS2R = Rim-mounted, secondary  
LM1 = liquid-mounted resilient filled seal, primary  
LM2 = Rim-mounted shield  
LMW = Weather shield  
VM1 = Vapor mounted resilient filled seal, primary  
VM2 = Rim-mounted secondary  
VMW = Weather shield

3 Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

<sup>4</sup>Other than floating roofs

<sup>5</sup> Gas/Vapor flow rate the emission control device was designed to handle (specify Flow rate units)

Use the following codes to designate basis for estimate of control efficiency:

C = Calculations

**S = Sampling**

PART E NON-ROUTINE RELEASES

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

<u>Release</u>	<u>Date Started</u>	<u>Time (am/pm)</u>	<u>Date Stopped</u>	<u>Time (am/pm)</u>
<u>1</u>	<u>NA</u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>2</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>3</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>4</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>5</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>6</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>

10.24 Specify the weather conditions at the time of each release.

<u>Release</u>	<u>Wind Speed (km/hr)</u>	<u>Wind Direction</u>	<u>Humidity (%)</u>	<u>Temperature (°C)</u>	<u>Precipitation (Y/N)</u>
<u>1</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>2</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>3</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>4</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>5</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
<u>6</u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>

☐ Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles  $\geq 10$  microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

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<u>Physical State</u>		<u>Manufacture</u>	<u>Import</u>	<u>Process</u>	<u>Store</u>	<u>Dispose</u>	<u>Transport</u>
Dust	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Powder	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Fiber	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____
Aerosol	<1 micron	_____	_____	_____	_____	_____	_____
	1 to <5 microns	_____	_____	_____	_____	_____	_____
	5 to <10 microns	_____	_____	_____	_____	_____	_____

NA

☐ Mark (X) this box if you attach a continuation sheet.

## REFERENCES IN PARENTHESES

## SECTION 5 ENVIRONMENTAL FATE

## PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

## a. Photolysis:

Absorption spectrum coefficient (peak) .... 871 (1/M cm) at 284 nm (1)

Reaction quantum yield,  $\phi$  ..... No information at          nm

Direct photolysis rate constant,  $k_p$ , at ...  $<1.2 \times 10^{-3}$  1/hr when NO<sub>2</sub> ~~is known~~  
photolysis rate is 0.37/hr<sup>(2)</sup>

## b. Oxidation constants at 25°C:

For  $^1O_2$  (singlet oxygen),  $k_{ox}$  ..... No information 1/M hr

For  $RO_2$  (peroxy radical),  $k_{ox}$  ..... No information 1/M hr

c. Five-day biochemical oxygen demand,  $BOD_5$  ... Not applicable due to mg/l  
reaction with water

## d. Biotransformation rate constant:

For bacterial transformation in water,  $k_b$  ... No oxygen consumed 1/hr

Specify culture ..... in modified MITI test (3)

## e. Hydrolysis rate constants:

For base-promoted process,  $k_b$  ..... No information 1/M hr

For acid-promoted process,  $k_a$  ..... No information 1/M hr

For neutral process,  $k_n$  ..... No information 1/hr

f. Chemical reduction rate (specify conditions) Not expected

g. Other (such as spontaneous degradation) ... Polvurea formation under  
hydrolytic conditions. (4)

☐ Mark (X) this box if you attach a continuation sheet.

## PART B PARTITION COEFFICIENTS

5.02 a. Specify the half-life of the listed substance in the following media.

<u>Media</u>	<u>Half-life (specify units)</u>
Groundwater	<< 1 day in water solution (4)
Atmosphere	26 hr (2)
Surface water	<< 1 day in water solution (4)
Soil	< 1 day (4)

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

<u>CAS No.</u>	<u>Name</u>	<u>Half-life (specify units)</u>	<u>Media</u>
Not found	Polyurea	> 1 yr	in water and soil (4)
95-80-7	2,4-Toluene diamine	< 1 day	} in biological waste-water treatment
823-40-5	2,6-Toluene diamine	< 1 day	
5206-52-0	Urea, <del>NNN'</del> -bis(3-isocyanato-4-methylphenyl)-	Unknown half-life	in plant (4)
			(5,6)

5.03 Specify the octanol-water partition coefficient,  $K_{ow}$  ... reacts with both \_\_\_\_\_ at 25°C  
 Method of calculation or determination ..... octanol and water

5.04 Specify the soil-water partition coefficient,  $K_d$  ..... reacts with \_\_\_\_\_ at 25°C  
 Soil type ..... water

5.05 Specify the organic carbon-water partition coefficient,  $K_{oc}$  ..... reacts with \_\_\_\_\_ at 25°C  
 water

5.06 Specify the Henry's Law Constant,  $H$  ..... reacts with \_\_\_\_\_ atm-m<sup>3</sup>/mole  
 water

☐ Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

<u>Bioconcentration Factor</u>	<u>Species</u>	<u>Test</u> <sup>1</sup>
None detected	<sup>n</sup> <i>Moina macrocarpa</i> Straus	Not defined (4)
None detected	<sup>s</sup> <i>Cyprinus carpio</i>	Not defined (4)

<sup>1</sup>Use the following codes to designate the type of test:

F = Flowthrough  
S = Static

- (1) Phillips and Nachod, eds., Organic Electronic Spectral Data, Vol IV, pg. 200.
- (2) K. H. Becker, V. Bastian and Th. Klein, The reactions of toluenediisocyanate, toluenediamine and methylenedianiline under simulated atmospheric conditions, J. Photochem. and Photobiol., A: Chemistry, 45 (1988) 195-205.
- (3) N. Caspers, B. Hamburger, R. Kanne and Waklebert, Ecotoxicity of TDI, MDI, TDA and MDA, Report to the International Isocyanate Institute, E-CE-41, 1986. Quoted in D. S. Gilbert, Fate of TDI and MDI in Air, Soil and Water, Polyurethanes World Congress 1987, Proceedings of the SPI/FSK.
- (4) F. K. Brochhagen and B. M. Grieveson, Environmental aspects of isocyanates in water and soil, Cellular Polymers, 3 (1984) 11-17.
- (5) K. Marcali, Microdetermination of toluenediisocyanate in atmosphere, Anal. Chem. 29 (1957) 552-558.
- (6) G.A.Campbell, T.J.Dearlove and W.C.Meluch, Diisocyanatotolylurea, U.S. Patent 3,906,019 (1975), Chem. Abs. 84:5645h.

☐ Mark (X) this box if you attach a continuation sheet.



6.04 For each market listed below, state the quantity sold and the total sales value of the listed substance sold or transferred in bulk during the reporting year.

☐

<u>Market</u>	<u>Quantity Sold or Transferred (kg/yr)</u>	<u>Total Sales Value (\$/yr)</u>
Retail sales		
Distribution -- Wholesalers		
Distribution -- Retailers		
Intra-company transfer		
Repackagers		
Mixture producers		
Article producers		
Other chemical manufacturers or processors		
Exporters		
Other (specify)		

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use in your current operation, and which results in a final product with comparable performance in its end uses.

CBI

☐

<u>Substitute</u>	<u>Cost (\$/kg)</u>
NONE	

☐ Mark (X) this box if you attach a continuation sheet.

SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

General Instructions:

For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing the major (greatest volume) process type involving the listed substance.

CBI

☐ Process type ..... Resin Polymerization Process

See enclosed diagram

☒ Mark (X) this box if you attach a continuation sheet. See p42B

7.03 In accordance with the instructions, provide a process block flow diagram showing process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if not treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

☐ Process type ..... Resin Polymerization Process

See diagram for 7.01

☐ Mark (X) this box if you attach a continuation sheet.

7:04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Unit Operation ID Number	Typical Equipment Type	Operating Temperature Range (°C)	Operating Pressure Range (mm Hg)	Vessel Compositio
<u>7.1</u>	<u>Storage Tank</u>	<u>21-27</u>	<u>Atmospheric</u>	<u>Carbon</u>
<u>7.2</u>	<u>Reaction Vessel</u>	<u>90-95</u>	<u>Atmospheric</u>	<u>steel</u>
<u>7.3</u>	<u>Fume Scrubber</u>	<u>Ambient</u>	<u>Atmospheric</u>	<u>Carbon</u>
<u>7.4</u>	<u>Filter</u>	<u>65</u>	<u>Atmospheric</u>	<u>steel</u>
			<u>45600</u>	<u>Stainless</u>
				<u>steel</u>

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If process block flow diagram is provided for more than one process type, photocopy the question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Process Stream ID Code	Process Stream Description	Physical State <sup>1</sup>	1988 Stream Flow (kg/yr)
<u>7A</u>	<u>Toluene Diisocyanate</u>	<u>OL</u>	<u>40500</u>
<u>7B</u>	<u>Toluene Diisocyanate</u>	<u>OL</u>	<u>41400</u>
<u>7C</u>	<u>Alkyd Polymer</u>	<u>OL</u>	<u>435600</u>
<u>7D</u>	<u>Rework Material</u>	<u>OL</u>	<u>0</u>
<u>7E, 7F</u>	<u>Urethane Resin</u>	<u>OL</u>	<u>466800</u>
<u>7G</u>	<u>Spent Filter Media</u>	<u>SO</u>	<u>1100</u>
<u>7H</u>	<u>Defective Resin</u>	<u>OL</u>	<u>10300</u>
<u>7I</u>	<u>Storage Tank Vent</u> (during tankwagon unloading)	<u>GU</u>	<u>40</u>

<sup>1</sup>Use the following codes to designate the physical state for each process stream:

- GC = Gas (condensable at ambient temperature and pressure)
- GU = Gas (uncondensable at ambient temperature and pressure)
- SO = Solid
- SY = Sludge or slurry
- AL = Aqueous liquid
- OL = Organic liquid
- IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☒ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type ..... Resin Polymerization Process

a. Process Stream ID Code	b. Known Compounds <sup>1</sup>	c. Concen- trations <sup>2,3</sup> (% or ppm)	d. Other Expected Compounds	e. Estimated Concentrations (% or ppm)
<u>7A, 7B</u>	<u>Toluene Diisocyanate</u>	<u>100%(A)(W)</u>	<u>NA</u>	<u>NA</u>
<u>7C, 7D</u>	<u>Alkyd Polymer</u>	<u>100%(E)(W)</u>	<u>NA</u>	<u>NA</u>
<u>7E, 7F, 7H</u>	<u>Urethane Resin</u>	<u>100%(E)(W)</u>	<u>NA</u>	<u>NA</u>

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

7.06 (continued)

<sup>1</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
1	NA	NA
2		
3		
4		
5		

<sup>2</sup>Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

<sup>3</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

☐ Mark (X) this box if you attach a continuation sheet.

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**SECTION 8 RESIDUAL TREATMENT GENERATION, CHARACTERIZATION, TRANSPORTATION, AND MANAGEMENT**

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**General Instructions:**

For questions 8.04-8.06, provide a separate response for each residual treatment block flow diagram provided in question 8.01, 8.02 or 8.03. Identify the process type from which the information is extracted.

For questions 8.05-8.33, the Stream Identification Codes are those process streams listed in either the Section 7 or Section 8 block flow diagrams which contain residuals for each applicable waste management method.

For questions 8.07-8.33, if residuals are combined before they are handled, list those Stream Identification Codes on the same line.

Questions 8.09-8.33 refer to the waste management activities involving the residuals identified in either the Section 7 or Section 8 block flow diagrams. Not all Stream Identification Codes used in the sample answers (e.g., for the incinerator questions) have corresponding process streams identified in the block flow diagram(s). These Stream Identification codes are for illustrative purposes only.

For questions 8.11-8.33, if you have provided the information requested on one of the EPA Office of Solid Waste surveys listed below within the three years prior to your reporting year, you may submit a copy or reasonable facsimile in lieu of answering those questions which the survey addresses. The applicable surveys are: (1) Hazardous Waste Treatment, Storage, Disposal, and Recycling Survey; (2) Hazardous Waste Generator Survey; or (3) Subtitle D Industrial Facility Mail Survey.

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☐ Mark (X) this box if you attach a continuation sheet.

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PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.0

CBI

☐ Process type ..... NA

☐ Mark (X) this box if you attach a continuation sheet.

## PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type ..... *Res. Dis.*

☐ Process type ..... Resin Polymerization Process

[illegible]

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

<sup>1</sup>Use the following codes to designate the type of hazardous waste:

- I = Ignitable
- C = Corrosive
- R = Reactive
- E = EP toxic
- T = Toxic
- H = Acutely hazardous

<sup>2</sup>Use the following codes to designate the physical state of the residual:

- GC = Gas (condensable at ambient temperature and pressure)
- GU = Gas (uncondensable at ambient temperature and pressure)
- SO = Solid
- SY = Sludge or slurry
- AL = Aqueous liquid
- OL = Organic liquid
- IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

---

8.05 continued below

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☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

<sup>3</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

Additive Package Number	Components of Additive Package	Concentrations (% or ppm)
<u>1</u>	<u>NA</u>	<u>NA</u>
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		

<sup>4</sup>Use the following codes to designate how the concentration was determined:

- A = Analytical result
- E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

<sup>5</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

<sup>6</sup>Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

<u>Code</u>	<u>Method</u>	<u>Detection Limi</u> <u>(± ug/l)</u>
<u>1</u>	NA	NA
<u>2</u>		
<u>3</u>		
<u>4</u>		
<u>5</u>		
<u>6</u>		

☐ Mark (X) this box if you attach a continuation sheet.

**CBI**

**a.**

b.

**C.**

d.

e.

f.

**g.**

<sup>1</sup>Use the codes provided in Exhibit 8-1 to designate the waste descriptions  
<sup>2</sup>Use the codes provided in Exhibit 8-2 to designate the management methods

58

## WASTE DESCRIPTION CODES

These waste description codes were developed specifically for this survey to supplement the descriptions listed with the RCRA and other waste codes. (These waste description codes are not regulatory definitions.)

### WASTE DESCRIPTION CODES FOR HAZARDOUS WASTE DESCRIBED BY A SINGLE RCRA F, K, P, OR U WASTE CODE

A01 Spent solvent (F001-F005, K086)	A06 Contaminated soil or cleanup residue	A10 Incinerator ash
A02 Other organic liquid (F001-F005, K086)	A07 Other F or K waste, exactly as described*	A11 Solidified treatment residue
A03 Still bottom (F001-F005, K086)	A08 Concentrated off-spec or discarded product	A12 Other treatment residue (specify in "Facility Notes")
A04 Other organic sludge (F001-F005, K086)	A09 Empty containers	A13 Other untreated waste (specify in "Facility Notes")
A05 Wastewater or aqueous mixture		

\*"Exactly as described" means that the waste matches the description of the RCRA waste code.

**INORGANIC LIQUIDS**—Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content.

- B01 Aqueous waste with low solvents
- B02 Aqueous waste with low other toxic organics
- B03 Spent acid with metals
- B04 Spent acid without metals
- B05 Acidic aqueous waste
- B06 Caustic solution with metals but no cyanides
- B07 Caustic solution with metals and cyanides
- B08 Caustic solution with cyanides but no metals
- B09 Spent caustic
- B10 Caustic aqueous waste
- B11 Aqueous waste with reactive sulfides
- B12 Aqueous waste with other reactives (e.g., explosives)
- B13 Other aqueous waste with high dissolved solids
- B14 Other aqueous waste with low dissolved solids
- B15 Scrubber water
- B16 Leachate
- B17 Waste liquid mercury
- B18 Other inorganic liquid (specify in "Facility Notes")

**INORGANIC SLUDGES**—Waste that is primarily inorganic, with moderate-to-high water content and low organic content; pumpable.

- B19 Lime sludge without metals
- B20 Lime sludge with metals/metal hydroxide sludge
- B21 Wastewater treatment sludge with toxic organics
- B22 Other wastewater treatment sludge
- B23 Untreated plating sludge without cyanides
- B24 Untreated plating sludge with cyanides
- B25 Other sludge with cyanides
- B26 Sludge with reactive sulfides
- B27 Sludge with other reactives
- B28 Degreasing sludge with metal scale or filings
- B29 Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)
- B30 Sediment or lagoon dragout contaminated with organics
- B31 Sediment or lagoon dragout contaminated with inorganics only

- B32 Drilling mud
- B33 Asbestos slurry or sludge
- B34 Chloride or other brine sludge
- B35 Other inorganic sludge (specify in "Facility Notes")

**INORGANIC SOLIDS**—Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable.

- B36 Soil contaminated with organics
- B37 Soil contaminated with inorganics only
- B38 Ash, slag, or other residue from incineration of wastes
- B39 Other "dry" ash, slag, or thermal residue
- B40 "Dry" lime or metal hydroxide solids chemically "fixed"
- B41 "Dry" lime or metal hydroxide solids not "fixed"
- B42 Metal scale, filings, or scrap
- B43 Empty or crushed metal drums or containers
- B44 Batteries or battery parts, casings, cores
- B45 Spent solid filters or adsorbents
- B46 Asbestos solids and debris
- B47 Metal-cyanide salts/chemicals
- B48 Reactive cyanide salts/chemicals
- B49 Reactive sulfide salts/chemicals
- B50 Other reactive salts/chemicals
- B51 Other metal salts/chemicals
- B52 Other waste inorganic chemicals
- B53 Lab packs of old chemicals only
- B54 Lab packs of debris only
- B55 Mixed lab packs
- B56 Other inorganic solids (specify in "Facility Notes")

**INORGANIC GASES**—Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure.

- B57 Inorganic gases

**ORGANIC LIQUIDS**—Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content.

- B58 Concentrated solvent-water solution
- B59 Halogenated (e.g., chlorinated) solvent
- B60 Nonhalogenated solvent

- A10 Incinerator ash
- A11 Solidified treatment residue
- A12 Other treatment residue (specify in "Facility Notes")
- A13 Other untreated waste (specify in "Facility Notes")

- B61 Halogenated/nonhalogenated solvent mixture
- B62 Oil-water emulsion or mixture
- B63 Waste oil
- B64 Concentrated aqueous solution of other organics
- B65 Concentrated phenolics
- B66 Organic paint, ink, lacquer, or varnish
- B67 Adhesives or epoxies
- B68 Paint thinner or petroleum distillates
- B69 Reactive or polymerizable organic liquid
- B70 Other organic liquid (specify in "Facility Notes")

**ORGANIC SLUDGES**—Waste that is primarily organic, with low-to-moderate inorganic solids content and water content; pumpable.

- B71 Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids
- B72 Still bottoms of nonhalogenated solvents or other organic liquids
- B73 Oily sludge
- B74 Organic paint or ink sludge
- B75 Reactive or polymerizable organics
- B76 Resins, tars, or tarry sludge
- B77 Biological treatment sludge
- B78 Sewage or other untreated biological sludge
- B79 Other organic sludge (specify in "Facility Notes")

**ORGANIC SOLIDS**—Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable.

- B80 Halogenated pesticide solid
- B81 Nonhalogenated pesticide solid
- B82 Solid resins or polymerized organics
- B83 Spent carbon
- B84 Reactive organic solid
- B85 Empty fiber or plastic containers
- B86 Lab packs of old chemicals only
- B87 Lab packs of debris only
- B88 Mixed lab packs
- B89 Other halogenated organic solid
- B90 Other nonhalogenated organic solid

**ORGANIC GASES**—Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure.

- B91 Organic gases

EXHIBIT 8-2.  
(Refers to question 8.06(c))

MANAGEMENT METHODS

- M1 = Discharge to publicly owned wastewater treatment works
- M2 = Discharge to surface water under NPDES
- M3 = Discharge to off-site, privately owned wastewater treatment works
- M4 = Scrubber: a) caustic; b) water; c) other
- M5 = Vent to: a) atmosphere; b) flare; c) other (specify) \_\_\_\_\_
- M6 = Other (specify) \_\_\_\_\_

Recovery of solvents and liquid organics for reuse

- 1SR Fractionation
- 2SR Batch still distillation
- 3SR Solvent extraction
- 4SR Thin-film evaporation
- 5SR Filtration
- 6SR Phase separation
- 7SR Dessication
- 8SR Other solvent recovery

TREATMENT AND RECYCLING

Incineration/thermal treatment

- 1I Liquid injection
- 2I Rotary or rocking kiln
- 3I Rotary kiln with a liquid injection unit
- 4I Two stage
- 5I Fixed hearth
- 6I Multiple hearth
- 7I Fluidized bed
- 8I Infrared
- 9I Fume/vapor
- 10I Pyrolytic destructor
- 11I Other incineration/thermal treatment

Reuse as fuel

- 1RF Cement kiln
- 2RF Aggregate kiln
- 3RF Asphalt kiln
- 4RF Other kiln
- 5RF Blast furnace
- 6RF Sulfur recovery furnace
- 7RF Smelting, melting, or refining furnace
- 8RF Coke oven
- 9RF Other industrial furnace
- 10RF Industrial boiler
- 11RF Utility boiler
- 12RF Process heater
- 13RF Other reuse as fuel unit

Fuel Blending

- 1FB Fuel blending

Solidification

- 1S Cement or cement/silicate processes
- 2S Pozzolan processes
- 3S Asphaltic processes
- 4S Thermoplastic techniques
- 5S Organic polymer techniques
- 6S Jacketing (macro-encapsulation)
- 7S Other solidification

Recovery of metals

- 1MR Activated carbon (for metals recovery)
- 2MR Electrodialysis (for metals recovery)
- 3MR Electrolytic metal recovery
- 4MR Ion exchange (for metals recovery)
- 5MR Reverse osmosis (for metals recovery)
- 6MR Solvent extraction (for metals recovery)
- 7MR Ultrafiltration (for metals recovery)
- 8MR Other metals recovery

Wastewater Treatment

After each wastewater treatment type listed below (1WT - 66WT) specify a) tank; or b) surface impoundment (i.e., 63WTA)

Equalization

- 1WT Equalization

Cyanide oxidation

- 2WT Alkaline chlorination
- 3WT Ozone
- 4WT Electrochemical
- 5WT Other cyanide oxidation

General oxidation (including disinfection)

- 6WT Chlorination
- 7WT Ozonation
- 8WT UV radiation
- 9WT Other general oxidation

Chemical precipitation<sup>1</sup>

- 10WT Lime
- 11WT Sodium hydroxide
- 12WT Soda ash
- 13WT Sulfide
- 14WT Other chemical precipitation

Chromium reduction

- 15WT Sodium bisulfite
- 16WT Sulfur dioxide



EXHIBIT 8-2. (continued)

MANAGEMENT METHODS

- 17WT Ferrous sulfate
  - 18WT Other chromium reduction
  - Complexed metals treatment (other than chemical precipitation by pH adjustment)
  - 19WT Complexed metals treatment
  - Emulsion breaking
  - 20WT Thermal
  - 21WT Chemical
  - 22WT Other emulsion breaking
  - Adsorption
  - 23WT Carbon adsorption
  - 24WT Ion exchange
  - 25WT Resin adsorption
  - 26WT Other adsorption
  - Stripping
  - 27WT Air stripping
  - 28WT Steam stripping
  - 29WT Other stripping
  - Evaporation
  - 30WT Thermal
  - 31WT Solar
  - 32WT Vapor recompression
  - 33WT Other evaporation
  - Filtration
  - 34WT Diatomaceous earth
  - 35WT Sand
  - 36WT Multimedia
  - 37WT Other filtration
  - Sludge dewatering
  - 38WT Gravity thickening
  - 39WT Vacuum filtration
  - 40WT Pressure filtration (belt, plate and frame, or leaf)
  - 41WT Centrifuge
  - 42WT Other sludge dewatering
  - Air flotation
  - 43WT Dissolved air flotation
  - 44WT Partial aeration
  - 45WT Air dispersion
  - 46WT Other air flotation
  - Oil skimming
  - 47WT Gravity separation
  - 48WT Coalescing plate separation
  - 49WT Other oil skimming
  - Other liquid phase separation
  - 50WT Decanting
  - 51WT Other liquid phase separation
  - Biological treatment
  - 52WT Activated sludge
  - 53WT Fixed film-trickling filter
  - 54WT Fixed film-rotating contactor
  - 55WT Lagoon or basin, aerated
  - 56WT Lagoon, facultative
  - 57WT Anaerobic
  - 58WT Other biological treatment
  - Other wastewater treatment
  - 59WT Wet air oxidation
  - 60WT Neutralization
  - 61WT Nitrification
  - 62WT Denitrification
  - 63WT Flocculation and/or coagulation
  - 64WT Settling (clarification)
  - 65WT Reverse osmosis
  - 66WT Other wastewater treatment
- OTHER WASTE TREATMENT
- 1TR Other treatment
  - 2TR Other recovery for reuse
- ACCUMULATION
- 1A Containers
  - 2A Tanks
- STORAGE
- 1ST Container (i.e., barrel, drum)
  - 2ST Tank
  - 3ST Waste pile
  - 4ST Surface impoundment
  - 5ST Other storage
- DISPOSAL
- 1D Landfill
  - 2D Land treatment
  - 3D Surface impoundment (to be closed as a landfill)
  - 4D Underground injection well

<sup>1</sup>Chemical precipitation is a treatment operation whereby the pH of a waste is adjusted to the range necessary for removal (precipitation) of contaminants. However, if the pH is adjusted solely to achieve a neutral pH, THE OPERATION SHOULD BE CONSIDERED NEUTRALIZATION (60WT).

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐

Incinerator	Combustion Chamber Temperature (°C)		Location of Temperature Monitor		Residence Time In Combustion Chamber (seconds)	
	Primary	Secondary	Primary	Secondary	Primary	Secondary
1						
2						
3						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

☐

Incinerator	Air Pollution Control Device <sup>1</sup>	Types of Emissions Data Available
1	NA	NA
2		
3		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

<sup>1</sup>Use the following codes to designate the air pollution control device: .....

S = Scrubber (include type of scrubber in parenthesis)

E = Electrostatic precipitator

O = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

# PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records of the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI  
[ ]

Data Element	Data are Maintained for:		Year in Which Data Collection Began	Number of Years Records Are Maintained
	Hourly Workers	Salaried Workers		
Date of hire	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Age at hire	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Work history of individual before employment at your facility	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Sex	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Race	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Job titles	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Start date for each job title	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
End date for each job title	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Work area industrial hygiene monitoring data	<u>X</u>	<u>X</u>	<u>1972</u>	<u>30 yrs</u>
Personal employee monitoring data	<u>X</u>	<u>X</u>	<u>1972</u>	<u>30 yrs</u>
Employee medical history	<u>X</u>	<u>X</u>	<u>1947</u>	<u>30 yrs</u>
Employee smoking history	<u>X</u>	<u>X</u>	<u>1980</u>	<u>30 yrs</u>
Accident history	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Retirement date	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Termination date	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Vital status of retirees	<u>X</u>	<u>X</u>	<u>1947</u>	<u>Permanent</u>
Cause of death data	<u>NA</u>	<u>NA</u>	<u>NA</u>	<u>NA</u>

[ ] Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

a.	b.	c.	d.	e.
<u>Activity</u>	<u>Process Category</u>	<u>Yearly Quantity (kg)</u>	<u>Total Workers</u>	<u>Total Worker-Hours</u>
Manufacture of the listed substance	Enclosed	NA		
	Controlled Release	NA		
	Open	NA		
On-site use as reactant	Enclosed	41405	20	899
	Controlled Release	NA		
	Open	NA		
On-site use as nonreactant	Enclosed	NA		
	Controlled Release	NA		
	Open	NA		
On-site preparation of products	Enclosed	NA		
	Controlled Release	NA		
	Open	NA		

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A  
B  
C  
D  
E  
F  
G  
H  
I  
J

Resin Production Supervisor

Tankwagon Attendant

Resin Finishers

Reactor Operators

Relief Reactor Operators

Resin Process Engineer

☐ Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

☐ Process type ..... Resin Polymerization Process

See enclosed diagram

☒ Mark (X) this box if you attach a continuation sheet.

9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. -Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Work Area ID

Description of Work Areas and Worker Activities

1	<u>Tank wagon Unloading (Worker unloads tanker)</u>
2	<u>TDI storage Tank Room (Worker sets meter, open and closes valve, turns pump on &amp; off)</u>
3	<u>Blend Room (Workers could be working on other batches in area when TDI add is made to reaction vessel)</u>
4	
5	
6	
7	
8	
9	
10	

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 1

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance <sup>1</sup>	Average Length of Exposure Per Day <sup>2</sup>	Number of Days per Year Exposed
<u>AB,D</u>	<u>2</u>	<u>direct skin contact, inhalation</u>	<u>OL</u>	<u>B</u>	<u>7</u>

<sup>1</sup>Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)  
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)  
 SO = Solid

SY = Sludge or slurry  
 AL = Aqueous liquid  
 OL = Organic liquid  
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

<sup>2</sup>Use the following codes to designate average length of exposure per day:

A = 15 minutes or less  
 B = Greater than 15 minutes, but not exceeding 1 hour  
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours  
 E = Greater than 4 hours, but not exceeding 8 hours  
 F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.



**CBI**

Work area .....

☐ Mark (X) this box if you attach a continuation sheet.

# PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table

CBI

☐

Sample/Test	Work Area ID	Testing Frequency (per year)	Number of Samples (per test)	Who Samples <sup>1</sup>	Analyzed In-House (Y/N)	Number of Years Records Maintained
Personal breathing zone	NA					
General work area (air)	1,2,3	4	2	A	Y	30 yrs
Wipe samples	NA					
Adhesive patches	NA					
Blood samples	NA					
Urine samples	NA					
Respiratory samples	NA					
Allergy tests	NA					
Other (specify)						
Other (specify)						
Other (specify)						

<sup>1</sup>Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

☐ Sample Type

Sampling and Analytical Methodology

General Work Area  
(Air)

Impingers w/nitro reagent collection media followed by high performance liquid chromatography of reagent

General Work Area  
(Air)

Monitor pulls controlled sample thru colorimetric paper tape which is continuously monitored by LED/photodiode combination to translate color change to readout

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

CBI

<input type="checkbox"/> Equipment Type <sup>1</sup>	Detection Limit <sup>2</sup>	Manufacturer	Averaging Time (hr)	Model Number
H	0.01C	HSA (pumps)	0.3-0.5	Flow-Lite
I	0.001A	GMD Systems, Inc.	0.03-2	Sample Pump 920-10

<sup>1</sup> Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify)

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) impinger and sampling pump set-ups
- I = Other (specify)

<sup>2</sup> Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter ( $\mu\text{g}/\text{m}^3$ )

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency  
(weekly, monthly, yearly, etc.)

NA

☐ Mark (X) this box if you attach a continuation sheet.

# PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 1

Engineering Controls	Used (Y/N)	Year Installed	Upgraded (Y/N)	Year Upgraded
Ventilation:				
Local exhaust	_____	_____	_____	_____
General dilution	_____	_____	_____	_____
Other (specify)	_____	_____	_____	_____
Vessel emission controls	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to and including 1988</u>
Mechanical loading or packaging equipment	_____	_____	_____	_____
Other (specify)	_____	_____	_____	_____
<u>Pneumatic interlocks</u> (emission control system must be on before process can be started)	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to &amp; including 1988</u>
Local emergency alarm	<u>Y</u>	<u>1989</u>	<u>N</u>	_____

☒ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 1, 2 & 3

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)
<u>NA</u>	

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 1

<u>Equipment Types</u>	<u>Wear or Use (Y/N)</u>
Respirators (air supplied)	<u>Y</u>
Safety goggles/glasses	<u>N</u>
Face shields	<u>Y</u>
Coveralls (impermeable)	<u>Y</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>Y</u>
Other (specify)	
<u>Rubber boots</u>	<u>Y</u>

☒ Mark (X) this box if you attach a continuation sheet.

- 9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Work Area	Respirator Type	Average Usage <sup>1</sup>	Fit Tested (Y/N)	Type of Fit Test <sup>2</sup>	Frequency of Fit Tests (per year)
<u>1,2</u>	<u>Air-line</u>	<u>B</u>	<u>Y</u>	<u>QL</u>	<u>1</u>
<u>3</u>	<u>Half-face cartridge</u>	<u>A</u>	<u>Y</u>	<u>QL</u>	<u>1</u>
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

<sup>1</sup>Use the following codes to designate average usage:

A = Daily  
 B = Weekly  
 C = Monthly  
 D = Once a year  
 E = Other (specify) \_\_\_\_\_

<sup>2</sup>Use the following codes to designate the type of fit test:

QL = Qualitative  
 QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.



# PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type ..... Resin Polymerization Process

Work area ..... 1

Announcement of unloading and completion of unloading; Restrict access during unloading; Area marked w/signs during unloading; Neutralizer solution in vicinity; Any spills immediately neutralized; Receive certification of analysis (avoid exposure from having to sample tank wagon); Annual training on TDI emergency response procedures; Annual review of written procedures; Immediate notification of and repair of any malfunctions; Standby person in event of an emergency; Copy of procedure posted in area; Confirm level in tank vs. consumption log prior to unloading

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... Resin Polymerization Process

Work area ..... 1

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
Vacuuming	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
Water flushing of floors	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

→ Neutralize any material and pick-up with absorbents  
Follow with regular mopping

☒ Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

Yes ..... 1

No ..... 2

Emergency exposure

Yes ..... 1

No ..... 2

If yes, where are copies of the plan maintained?

Routine exposure: \_\_\_\_\_

Emergency exposure: \_\_\_\_\_

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

Yes ..... (1)

No ..... 2

If yes, where are copies of the plan maintained? Resin & Safety Office

Has this plan been coordinated with state or local government response organizations? Circle the appropriate response.

Yes ..... (1)

No ..... 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

Plant safety specialist ..... 1

Insurance carrier ..... 2

OSHA consultant ..... 3

Other (specify) \_\_\_\_\_ 4

☐ Mark (X) this box if you attach a continuation sheet.

## SECTION 10 ENVIRONMENTAL RELEASE

### General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance, however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

### PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area ..... ①
- Urban area ..... 2
- Residential area ..... ③
- Agricultural area ..... 4
- Rural area ..... 5
- Adjacent to a park or a recreational area ..... ⑥
- Within 1 mile of a navigable waterway ..... ⑦
- Within 1 mile of a school, university, hospital, or nursing home facility ..... ⑧
- Within 1 mile of a non-navigable waterway ..... 9
- Other (specify) \_\_\_\_\_ ..... 10

☐ Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude ..... 40 ° 31 , 46 "

Longitude ..... 79 ° 47 , 09 "

UTM coordinates ..... Zone \_\_\_\_\_, Northing \_\_\_\_\_, Easting \_\_\_\_\_

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation ..... \_\_\_\_\_ inches/year

Predominant wind direction ..... \_\_\_\_\_

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater ..... \_\_\_\_\_ meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of CBI Y, N, and NA.)

☐

On-Site Activity

Environmental Release

	<u>Air</u>	<u>Water</u>	<u>Land</u>
Manufacturing	<u>NA</u>	<u>NA</u>	<u>NA</u>
Importing	<u>NA</u>	<u>NA</u>	<u>NA</u>
Processing	<u>Y</u>	<u>NA</u>	<u>NA</u>
Otherwise used	<u>NA</u>	<u>NA</u>	<u>NA</u>
Product or residual storage	<u>NA</u>	<u>NA</u>	<u>NA</u>
Disposal	<u>NA</u>	<u>NA</u>	<u>NA</u>
Transport	<u>NA</u>	<u>NA</u>	<u>NA</u>

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air .....	<u>0.000003</u>	kg/yr ± <u>50</u> %
Quantity discharged in wastewaters .....	<u>0</u>	kg/yr ± <u>   </u> %
Quantity managed as other waste in on-site treatment, storage, or disposal units .....	<u>0</u>	kg/yr ± <u>   </u> %
Quantity managed as other waste in off-site treatment, storage, or disposal units .....	<u>0</u>	kg/yr ± <u>   </u> %

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

<u>Stream ID Code</u>	<u>Control Technology</u>	<u>Percent Efficiency</u>
<u>7A</u>	<u>No pump-- Mat'l loaded into storage tank by pressurizing tanker</u>	<u>100%</u>
<u>7B</u>	<u>Magnetic Pump &amp; Meter - no seals</u>	<u>100%</u>
<u>7I, 7K, 7L</u>	<u>Fume Scrubber</u>	<u>99.99 %</u>
<u>7J</u>	<u>High Setting Conservation Vent</u>	<u>99.99 %</u>
<u>7M</u>	<u>None</u>	<u>0%</u>

☐ Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

CBI

☐

Process type ..... Resin Polymerization Process

Point Source

---ID Code

Description of Emission Point Source

7M

Fume Scrubber Vent

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

Point Source ID Code	Physical State <sup>1</sup>	Average Emissions (kg/day)	Frequency <sup>2</sup> (days/yr)	Duration <sup>3</sup> (min/day)	Average Emission Factor <sup>4</sup>	Maximum Emission Rate (kg/min)	Maximum Emission Rate Frequency (events/yr)	Maximum Emission Rate Duration (min/event)
7M	G	$4 \times 10^{-8}$	71	20	$2 \times 10^{-11}$	$1.4 \times 10^{-8}$	7	20

<sup>1</sup>Use the following codes to designate physical state at the point of release:  
G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) \_\_\_\_\_

<sup>2</sup>Frequency of emission at any level of emission

<sup>3</sup>Duration of emission at any level of emission

<sup>4</sup>Average Emission Factor -- Provide estimated ( $\pm$  25 percent) emission factor (kg of emission per kg of production of listed substance)



**CBI**

[ ]

[illegible]<sup>2</sup>Width of attached or adjacent building

<sup>3</sup>Use the following codes to designate vent type:

H = Horizontal  
V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

## APPENDIX I: List of Continuation Sheets

Attach continuation sheets for sections of this form and optional information after this page. In column 1, clearly identify the continuation sheet by listing the question number to which it relates. In column 2, enter the inclusive page numbers of the continuation sheet for each question number.

[illegible]

☐ Mark (X) this box if you attach a continuation sheet.

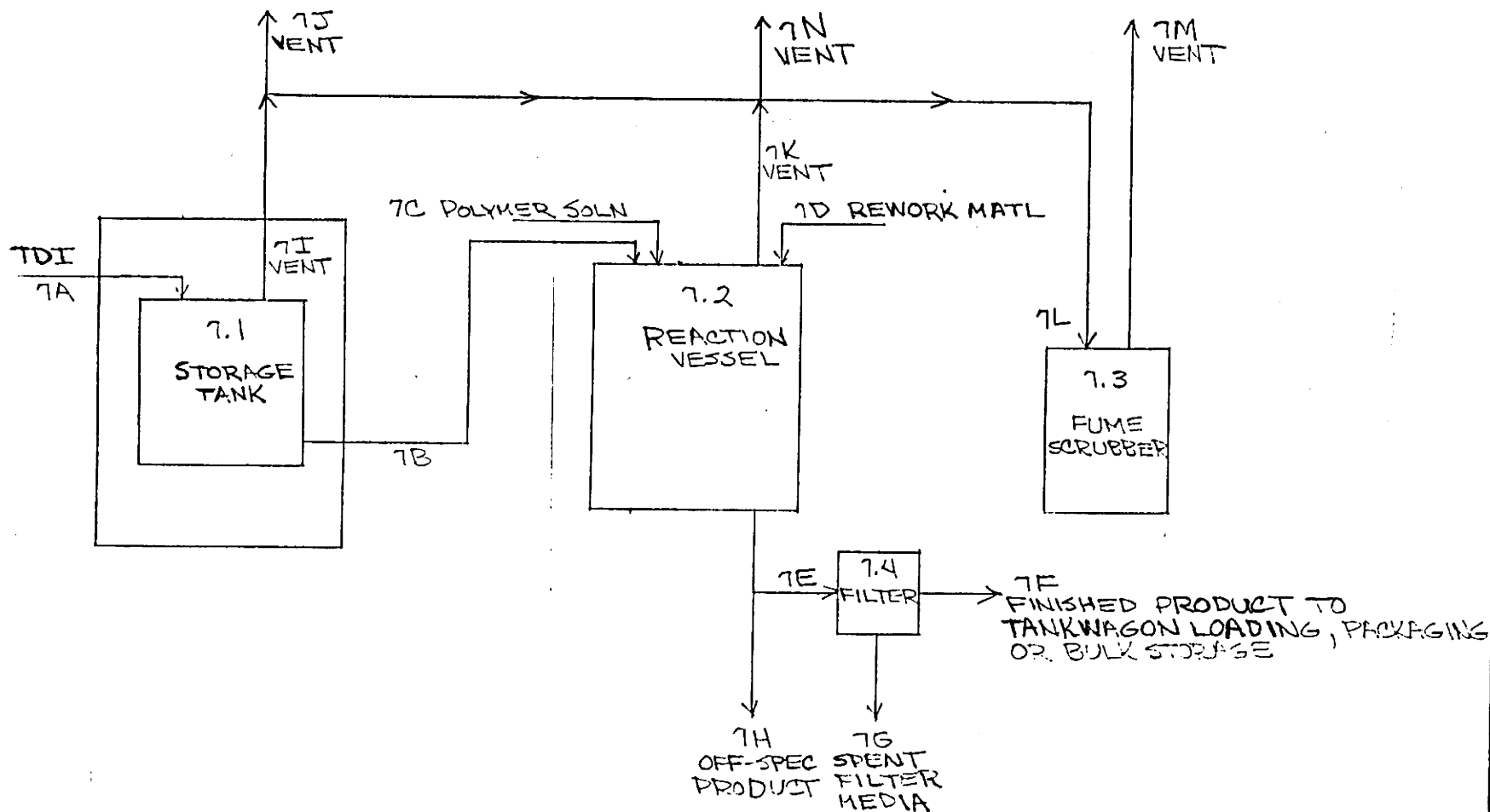


COATINGS & RESINS  
ENGINEERING DEPARTMENT

SUBJECT

BY \_\_\_\_\_ DATE \_\_\_\_\_  
CHKD. BY \_\_\_\_\_ DATE \_\_\_\_\_

PAGE \_\_\_\_\_ OF \_\_\_\_\_  
PROJECT NO. \_\_\_\_\_  
FLOW SHEET NO. \_\_\_\_\_  
AREA NO. \_\_\_\_\_  
ITEM NO. \_\_\_\_\_  
DRAWING NO. \_\_\_\_\_



PROCESS TYPE: RESIN POLYMERIZATION PROCESS

428

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Resin Polymerization Process

Process Stream ID Code	Process Stream Description	Physical State <sup>1</sup>	Stream Flow (kg/yr)
<u>7J</u>	<u>Storage Tank Vent</u>	<u>GU</u>	<u>UK</u>
<u>7K</u>	<u>(at times other than unloading)</u>		
<u>7L</u>	<u>Reaction Vessel Vent</u>	<u>GU</u>	<u>UK</u>
	<u>(during TDI adds and reaction)</u>		
<u>7M</u>	<u>Vent Line to Scrubber</u>	<u>GU</u>	<u>UK</u>
<u>7N</u>	<u>Scrubber Vent</u>	<u>GU</u>	<u>UK</u>
	<u>Reaction Vessel Vent</u>	<u>GU</u>	<u>UK</u>
	<u>(at times other than TDI adds and reaction)</u>		

<sup>1</sup>Use the following codes to designate the physical state for each process stream:

- GC = Gas (condensable at ambient temperature and pressure)
- GU = Gas (uncondensable at ambient temperature and pressure)
- SO = Solid
- SY = Sludge or slurry
- AL = Aqueous liquid
- OL = Organic liquid
- IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type .....

a. Process Stream ID Code	b. Known Compounds <sup>1</sup>	c. Concen- trations <sup>2,3</sup> (% or ppm)	d. Other Expected Compounds	e. Estimated Concentrations (% or ppm)
<u>7G</u>	<u>Urethane Resin</u>	<u>10%(EXW)</u>	<u>NA</u>	<u>NA</u>
<u>7I</u>	<u>TDI</u>	<u>peak 35 ppm (EXV)</u>	<u>NA</u>	<u>NA</u>
	<u>N<sub>2</sub></u>	<u>99.99% (EXV)</u>		
<u>7J</u>	<u>N<sub>2</sub></u>	<u>100% (EXV)</u>	<u>TDI</u>	<u>&lt; 1 ppb</u>

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type ..... Resin Polymerization Process

a. Process Stream ID Code	b. Known Compounds <sup>1</sup>	c. Concen- trations <sup>2,3</sup> (% or ppm)	d. Other Expected Compounds	e. Estimated Concentrations (% or ppm)
<u>7K</u>	<u>UK</u>	<u>UK</u>	<u>TDI</u>	<u>&lt;1 ppb</u>
			<u>N<sub>2</sub></u>	<u>99+ %</u>
<u>7L</u>	<u>TDI</u>	<u>peak</u>		
	<u>N<sub>2</sub></u>	<u>35 ppm (E)(V)</u>		
		<u>99.99% (E)(V)</u>		
<u>7M</u>	<u>TDI</u>	<u>0.004 ppm (A)(W)</u>	<u>CO<sub>2</sub></u>	<u>70 ppm</u>
	<u>N<sub>2</sub></u>	<u>99.99% (E)(V)</u>	<u>H<sub>2</sub>O</u>	<u>1%</u>

7.06 continued below

☒ Mark (X) this box if you attach a continuation sheet.

**CBI**

[ ]

[illegible]

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.



COATINGS & RESINS  
ENGINEERING DEPARTMENT

SUBJECT \_\_\_\_\_

PAGE \_\_\_\_\_ OF \_\_\_\_\_

PROJECT NO. \_\_\_\_\_

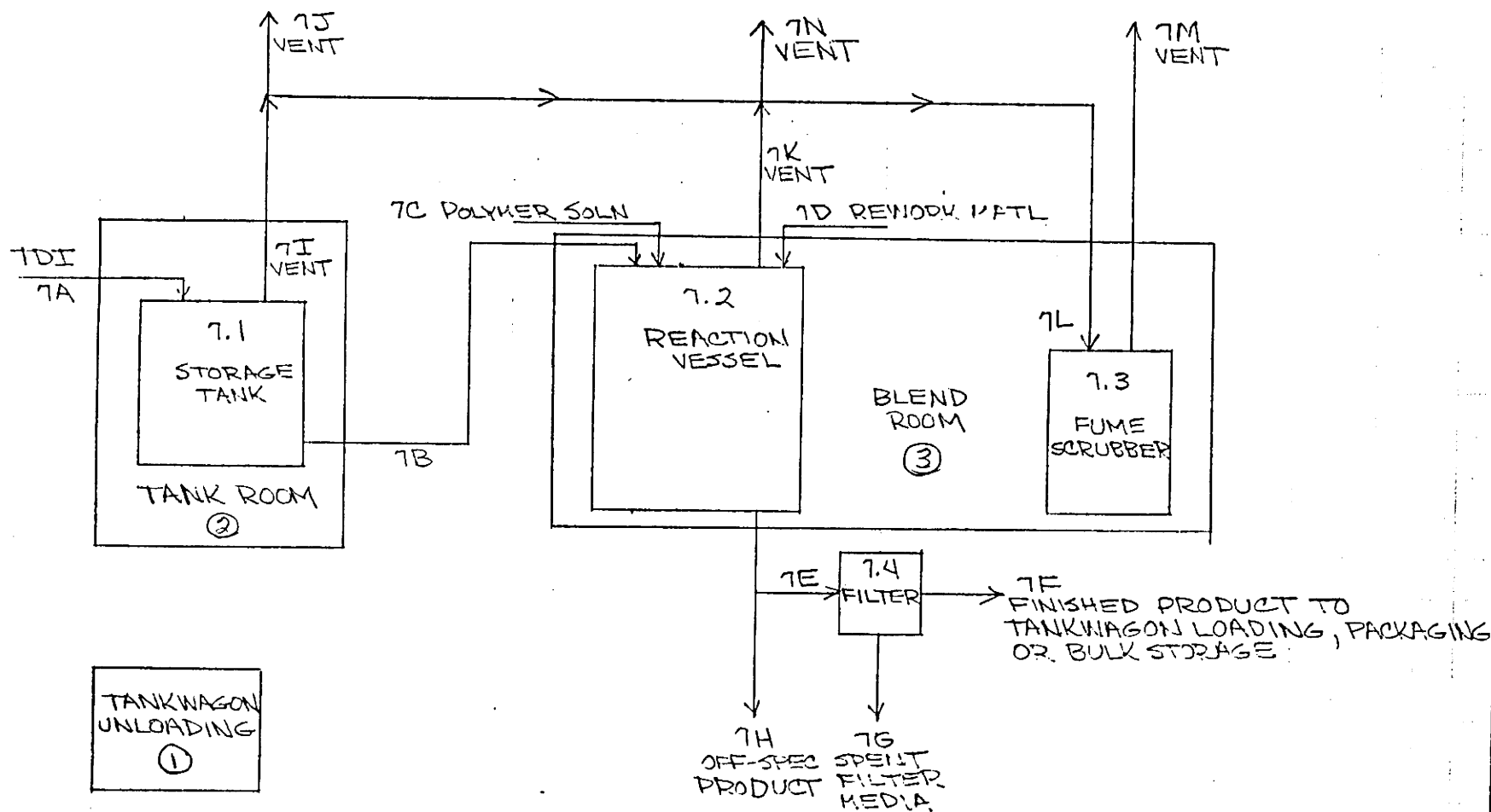
FLOW SHEET NO. \_\_\_\_\_

AREA NO. \_\_\_\_\_

ITEM NO. \_\_\_\_\_

DRAWING NO. \_\_\_\_\_

BY \_\_\_\_\_ DATE \_\_\_\_\_ CHKD. BY \_\_\_\_\_ DATE \_\_\_\_\_



PROCESS TYPE: RESIN POLYMERIZATION PROCESS

91B



9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 2

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance <sup>1</sup>	Average Length of Exposure Per Day <sup>2</sup>	Number of Days per Year Exposed
<u>C, D, E</u>	<u>1</u>	<u>inhalation</u>	<u>OL</u>	<u>A</u>	<u>64</u>

<sup>1</sup>Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)  
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)  
 SO = Solid

SY = Sludge or slurry  
 AL = Aqueous liquid  
 OL = Organic liquid  
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

<sup>2</sup>Use the following codes to designate average length of exposure per day:

A = 15 minutes or less  
 B = Greater than 15 minutes, but not exceeding 1 hour  
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours  
 E = Greater than 4 hours, but not exceeding 8 hours  
 F = Greater than 8 hours

☒ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 3

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance <sup>1</sup>	Average Length of Exposure Per Day <sup>2</sup>	Number of Days per Year Exposed
<u>AC, D, E, F</u>	<u>0-6</u>	<u>inhalation</u>	<u>OL</u>	<u>B</u>	<u>64</u>

<sup>1</sup>Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)  
 GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)  
 SO = Solid

SY = Sludge or slurry  
 AL = Aqueous liquid  
 OL = Organic liquid  
 IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

<sup>2</sup>Use the following codes to designate average length of exposure per day:

A = 15 minutes or less  
 B = Greater than 15 minutes, but not exceeding 1 hour  
 C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours  
 E = Greater than 4 hours, but not exceeding 8 hours  
 F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

# PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 2

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
Ventilation:				
Local exhaust	<u>Y</u>	<u>1989</u>	<u>N</u>	
General dilution	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>Enclosed tank into own room</u>	<u>Y</u>	<u>1973</u>	<u>N</u>	
Vessel emission controls	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to 4 including 1988</u>
Mechanical loading or packaging equipment	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>High level alarm (liquid in tank)</u>	<u>Y</u>	<u>1988</u>	<u>N</u>	
Pneumatic interlocks (emission control system must be on before process can be started)	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to 4 including 1988</u>

☐ Mark (X) this box if you attach a continuation sheet.

# PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 3

<u>Engineering Controls</u>	<u>Used (Y/N)</u>	<u>Year Installed</u>	<u>Upgraded (Y/N)</u>	<u>Year Upgraded</u>
<b>Ventilation:</b>				
Local exhaust	<u>Y</u>	<u>1947</u>	<u>Y</u>	<u>several times up to + including 1988</u>
General dilution	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>Vessel emission controls</u>	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to + including 1988</u>
Mechanical loading or packaging equipment	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>Pneumatic interlocks</u> (Emission control system must be on before process can be started)	<u>Y</u>	<u>1971</u>	<u>Y</u>	<u>several times up to + including 1988</u>
Temperature Control of Vessel	<u>Y</u>	<u>1971</u>	<u>N</u>	<u>      </u>

☐ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 2

Equipment Types	Wear or Use (Y/N)
Respirators (air supplied)	<u>Y</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>Y</u>
Other (specify)	
_____	_____
_____	_____

☒ Mark (X) this box if you attach a continuation sheet.

PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Resin Polymerization Process

Work area ..... 3

Equipment Types	Wear or Use (Y/N)
Respirators	<u>Y</u>
Safety goggles/glasses	<u>Y</u>
Face shields	<u>N</u>
Coveralls	<u>N</u>
Bib aprons	<u>N</u>
Chemical-resistant gloves	<u>Y</u>
Other (specify)	

☐ Mark (X) this box if you attach a continuation sheet.

## PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type ..... Resin Polymerization Process

Work area ..... 2

Restricted access to room; Area marked with signs during metering; Neutralizer solution in vicinity; Any spills or leaks immediately neutralized; Immediate notification and repair of any malfunctions; Annual training on TDI emergency response procedures; Annual review of written procedures; Signs posted on room door warning of hazard

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... Resin Polymerization Process

Work area ..... 2

### Housekeeping Tasks

Less Than  
Once Per Day

1-2 Times  
Per Day

3-4 Times  
Per Day

More Than 4  
Times Per Day

Sweeping

NA

Vacuuming

NA

Water flushing of floors

X

Other (specify)

Neutralize any material and pick-up with absorbents  
Follow with regular mopping

- ☒ Mark (X) this box if you attach a continuation sheet.

# PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type ..... Resin Polymerization Process

Work area ..... 3

Area marked with signs during TDI adds to reaction vessel; Annual training on TDI emergency response procedures  
Annual review of written procedures

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... Resin Polymerization Process

Work area ..... 3

<u>Housekeeping Tasks</u>	<u>Less Than Once Per Day</u>	<u>1-2 Times Per Day</u>	<u>3-4 Times Per Day</u>	<u>More Than 4 Times Per Day</u>
Sweeping	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
Vacuuming	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
Water flushing of floors	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
Other (specify)	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>
<u>      </u>	<u>NA</u>	<u>      </u>	<u>      </u>	<u>      </u>

☐ Mark (X) this box if you attach a continuation sheet.